

U.S. Department of Justice

*United States Attorney
Southern District of New York*

MEMO ENDORSED

*86 Chambers Street
New York, New York 10007*

May 28, 2025

By ECF

Hon. Andrew L. Carter, Jr.
United States Courthouse
40 Foley Square Street
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#:
DATE FILED: 5/29/2025

Re: *Jordan-Rowell v. United States*, 23 CV 2155 (ALC)

Dear Judge Carter:

In this action, *pro se* plaintiff Janessa Jordan-Rowell seeks a refund of purported income tax overpayments totaling over \$3 million for tax years 2019, 2020, 2021, 2022, 2023 and 2024, as well as additional damages of one billion dollars from the IRS for the disallowance of her administrative refund claims. Recently, Plaintiff amended her complaint to include tax years 2020, 2022, 2023, and 2024.

The Government is preparing a motion for summary judgment based on information contained in Plaintiff's taxpayer file. We write respectfully to request that the due date for the Government's motion be extended by two days, from May 28 to May 30, 2025. The request is being made to provide additional time for the undersigned and agency counsel to clarify relevant aspects of Plaintiff's administrative history. Further, the additional time will allow the Government to finalize a declaration from the IRS official and provide sufficient time for internal review of the motion papers. This is the third request for an extension of the filing deadline. The prior requests were granted by orders dated May 7 and May 21, 2025. I have been unable to reach Plaintiff to request her consent to the granting of this relief.

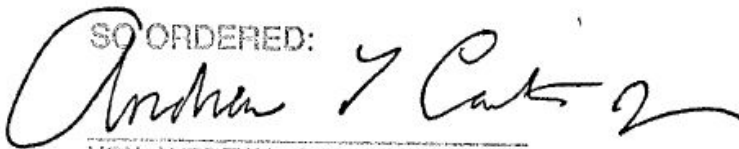
I thank the Court for its consideration of this matter.

Respectfully submitted,

JAY CLAYTON
United States Attorney for the
Southern District of New York
Attorney for the United States

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cc: Plaintiff (by regular mail)

SO ORDERED:


HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE
May 29, 2025